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**Via ECF**

Honorable Frederic Block, U.S.D.J.  
U. S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Steven B. Barger v. First Data Corporation et al.,*  
Civil Case No. 1:17-cv-4869**

Dear Judge Block:

The parties jointly submit this letter seeking the Court's direction regarding the sealing of certain documents that will be filed on February 28, 2019. Pursuant to the December 13, 2018 Scheduling Order, Defendants will file the parties' respective fully-briefed motions for summary judgment. Many of the exhibits that will be submitted in support of both parties' motions are marked "Confidential" pursuant to the Stipulated Order Regarding Confidentiality of Discovery Material dated November 30, 2017, and therefore, must be filed under seal. (ECF No. 23).

The Eastern District of New York's "Steps for E-Filing Sealed Documents – Civil Cases" provides that the party must file a motion for leave to e-file a sealed document. However, because Defendants are to file both parties' fully-briefed motions, it is unclear whether each party must then file their own motion for leave to e-file a sealed document.

The parties are available to confer on this matter. Thank you for your time and attention.

Respectfully submitted,

*/s/ Gary B. Eidelman*  
Gary B. Eidelman

cc: All Counsel of Record (via electronic mail)